

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

**Program Year:** 2017  
**Month of Review:** April  
**Lead Reviewer:** Christine Crow  
**Org Representative(s):**

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
200 - Verification	V-0200	Prior to notifying families that they were selected for verification, the SFA must have someone other than the determining official confirm that the original eligibility status was determined correctly and sign the confirming official line. There was no confirming official signature on the applications selected for verification. Technical assistance provided.	Confirm that the verifying official will take the verification webinar training for the 2017 - 2018 school year.	Valerie Hanson will take the 2017-18 verification webinar training.
800 - Civil Rights	V-0800	All staff with school nutrition responsibilities must receive annual civil rights training. This includes the authorized representative and all determining officials. The new food service employee at the middle school, the authorized representative and the determining officials did not receive civil rights training this school year. Training modules can be found under Download Forms in the CNP. Technical assistance provided.	Submit documentation to show that the new food service employee, the authorized representative and all three determining officials received civil rights training.	
800 - Civil Rights	V-0800	The USDA and Iowa non-discrimination statements must be on all program documents. If the entire statement cannot fit on a hard copy form, the abbreviated statements can be used. The menus did not contain the non-discrimination statement. Visit this website for the most current statement: <a href="https://www.educateiowa.gov/pk-12/nutrition-programs">https://www.educateiowa.gov/pk-12/nutrition-programs</a>	Update the menus found online and provide a copy of the menu and/or the website with the updated menu.	Menus have been updated online with the Iowa non-discrimination statement and USDA statement. Here is the link to the menus on our webpage. <a href="http://www.eagle-grove.k12.ia.us">http://www.eagle-grove.k12.ia.us</a>
1000 - Local School Wellness Policy	V-1000	The Local Wellness Policy and the assessment of how the policy goals are being implemented are not made available to the public as required. The policy was last revised in 2013 and it is required to be updated at least once every three years. A folder of school wellness resources was provided to the superintendent along with suggestions on updating the wellness policy.	Describe when the wellness policy will be updated and when and how the policy and the assessment of policy goals will be made available to the public.	
1400 - Food Safety	V-1400	The SFA has a HACCP Plan in place at both sites. The plan is missing some of the required elements including Standard Operating Procedures (SOPs) for contact and control of blood and bodily fluids,	Submit a revised table of contents for the HACCP Plan and include one new SOP	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

		field trips, dishwashing, receiving food and storing food. Sample SOPs can be found at the following Iowa State University Extension and Outreach site: <a href="http://www.extension.iastate.edu/foodsafety/node/21336#personnel">http://www.extension.iastate.edu/foodsafety/node/21336#personnel</a>	that will be included with the revised plan.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA's non-program food revenue, as a percentage of total food revenue was less than the non-program food costs as a percentage of total food costs. It is required that the non-program food revenue be equal to or greater than the non-program food costs. The business manager was not able to confirm that 2nd entrées or adult meals were included as a non-program food costs or revenue. Technical assistance provided.	Recalculate and submit the non-program revenue tool. If the revenue of non-program foods, as a percentage of total food revenue is not equal to or greater than the non-program food costs as a percentage of total food costs, describe steps that the SFA will implement to ensure the non-program food revenue is greater than the non-program food costs.	

**Site - Level Findings: Robert Blue School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	The rice, breadstick, breading on the fish, and croutons found on the menu during the review period were not whole grain rich. It is required that 100% of grains (unless the SFA has an exemption for a specific food) offered throughout the district are whole grain rich. There may be fiscal action if this error is found on future reviews at any school within the district. Technical assistance provided.	Describe the steps that both food service directors will implement to ensure 100% of grains offered throughout all schools within the district will be whole grain rich.	
400 - Meal Components and Quantities - Lunch	V-0400	The salad bar food production records do not include serving sizes and there was not a recipe provided for the chef salad option that is offered daily. Therefore, it was not clear if the daily and weekly vegetable requirements were made available to students during the review period. Technical assistance provided including a blank standardized recipe form and suggestions on how to condense and simplify the 4 pages of food production records currently used by food service director.	Modify the fruit and vegetable bar food production records to include serving sizes of foods offered. Submit one week of fruit and vegetable bar food production records and the food production records for the main line to show all vegetable requirements are met. Submit a standardized recipe for the chef salad.	

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		<p>As of July 1, 2017 all districts are required to have a Negative Balance Policy that describes how the district will manage negative lunch accounts. The policy is required to be given to all families at registration or upon enrollment. Technical assistance provided.</p> <p>Procurement:  It is recommend the district review SY 2016-2017 procurement plan and make necessary changes prior to progressing with developing bids and proposals for school food service purchases SY 2017-2018.  The district's food service procurement plan signature page can be edited to include only those staff names with their job title who are involved with school food service procurement.  The local purchase threshold for school food service purchases was not correct. The district must use the most restrictive threshold. The threshold for micro-purchase method would be less than \$3,500.  The district's Code of Conduct policy 409.3 does not identify the progressive disciplinary steps if a staff involved in the selection, award, and administration of contracts violates the policy. It is highly recommended this policy be reviewed.  All purchases made from specific vendors such as POS software updates, equipment repairs, and staff uniforms using the school nutrition funds should be identified on the school food service procurement plan.  We highly recommend all staff responsible for conducting and approving purchases using school nutrition funds attend the Procurement Basics training on June 21st at ISU.</p>
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	The wellness committee meeting notes were provided and they demonstrate the activities implemented by the committee. It is required to assess how all of the goals written within the policy are being implemented. The minutes do not specify the goals and/or provide an

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

		assessment of the progress of their implementation. Suggestions provided to the superintendent.
1200 - Professional Standards	1216 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	The SFA has 2 food service directors. The FSD at the elementary/middle school has met the professional standard training requirement of 12 training hours for this school year. The FSD at the high school has received 5.5 hours of training this school year and plans to attend the Manager's Update on 6/15/17 to obtain the remainder of her required 12 training hours. The food service staff at all sites who work more than 20 hours per week have not met their annual training requirement of 6 hours as they currently have 3.5 hours. The FSDs confirmed that their staff are going to attend a day long food safety course in June 2017 which will allow them to obtain their required hours. Training websites and modules provided. Technical assistance provided.
1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	The principals at all three schools within the district process income applications at registration. Therefore, they are required to have training on their school nutrition program responsibilities, including civil rights training. The superintendent confirms that the principals/determining officials will take the income application training webinar and civil rights training before the registration event for the 2017-2018 school year.
Other Federal Programs		Eagle Grove Elementary Fresh Fruit and Vegetable Program (FFVP): Documentation for Operation Labor Cost: There is no time log or time study documentation to validate the operating labor cost claimed for FFVP. Therefore, operating labor cost for March 2017 could not be validated. FFVP is a grant program available to elementary schools participating in the National School Lunch Program (NSLP). Any costs submitted for reimbursement must be documented. If no documentation is available, the cost is unallowable. Technical assistance was provided. A blank time log was provided to document operating labor hours going forward. Publicize FFVP: All schools that participate in the FFVP are required to widely publicize the availability of free fresh fruits and vegetables within the school. The program is not being publicized. The school can use various channels to inform staff, parents, and community of the program such as a short article in the school newsletter at the beginning of

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

		<p>the school year and mid-year, morning announcements, article on the district's wellness connections webpage with a link to the Iowa Department of Public Health (IDPH) Pick A Better Snack Resources.</p> <p>Nutrition Education: It is highly recommended nutrition education be provided with the service of the fresh fruits and vegetables. Some ways would be to incorporate nutrition education into the daily curriculum, preferably during the service of fresh fruits and vegetables, send Pick A Better Snack Bingo cards with parent newsletter.</p> <p>Consider using the Pick A Better Snack materials available at <a href="http://idph.iowa.gov/inn/pick-a-better-snack">http://idph.iowa.gov/inn/pick-a-better-snack</a>. These resources are available in English and Spanish. The resources include marketing materials, Bingo cards, fact sheets, family newsletters and teacher lessons. Materials are available in English and Spanish. USDA resources that can be used are Fruits and Vegetables Galore: Helping Kids Eat More. More resources can be found at <a href="https://www.fns.usda.gov/ffvp/fns-resources">https://www.fns.usda.gov/ffvp/fns-resources</a>.</p> <p>3). Non-reimbursable Items: Schools cannot serve other foods (even when these items are purchased through other funds) during FFVP snack service. This applies to any food item like milk. Students can take a milk break another time of the day. The goal of the FFVP is to introduce students to a variety of fresh fruits and vegetables as healthy snack options. By providing other foods during FFVP snack time, it detracts from the intent of the program.</p> <p>4). Safe Food Handling: The Food Service Director (FSD) does an excellent job with the preparation of the fresh fruits and vegetables. The delivery cart, trays, and tongs are for the exclusive use of the FFVP program. Safe food handling practices must be followed in the delivery and service of the FFVP snacks. Some of the uncovered snack trays are left un-monitored in a room until a staff or student from a particular classroom picks them up. There is potential for cross contamination. Each classroom has a hand sanitizer. One classroom followed the correct procedure when serving snacks and another did not. It is highly recommended that the FSD review and revise the FFVP SOP especially the distribution and the service of snacks. Provide a copy of the FFVP SOP to staff and substitute teachers/staff so they understand safe food handling practices. It is also recommended that the FSD periodically</p>
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

		monitor service of snacks and provide safe food handling training when practices are not observed.
--	--	----------------------------------------------------------------------------------------------------

**Site - Level Technical Assistance Robert Blue School (0209)**

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch		During the on-site review, students were going on a field trip and the food service provided a reimbursable lunch for all students to consume. Students were entered and counted/charged in Infinite Campus from the list of student names provided prior to the students leaving for their trip. Students must be counted and claimed at the point of service and not prior to receiving and eating their lunch. Technical assistance provided on implementing a POS count while students are on a field trip.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	The breakfast menu for one day during the review period included cereal, a poptart, juice, fruit, and milk. Students are allowed to take the cereal and poptart or just the poptart with their fruit/juice and milk. If taking just the poptart, the students would only receive 0.72 ounce grain equivalents, thus not meeting the 1.0 ounce grain requirement. Technical assistance provided on using the grain bread chart and suggestions to meet the grain requirement for this menu. The FSD agrees to give students the option to take cereal, cereal and poptart or 2 poptarts in order to meet the daily grain requirements.
400 - Meal Components and Quantities - Lunch		As of October 1, 2017 the preschool students are required to receive the CACFP meal pattern requirements instead of the NSLP meal pattern. The meal pattern was shared with the FSD.
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	There is a water fountain directly outside of the cafeteria. The FSD is encouraged to provide cups for students who would like a glass of water with their meal.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	The most recent food safety inspection report was posted behind the service counter next to the storage room. It is required to be posted in a location where the public can view it. Technical assistance provided.
1400 - Food Safety	1406 Were the selected relevant temperature logs available for review? If YES to specify which date was selected. If NO explain.	The SFA had temperature logs for the refrigerator, freezer and dishwasher. There were not any temperature logs or a thermometer for the 2 milk coolers at the review site. SA encourages the FSD to begin monitoring and recording the

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

		temperature of both milk coolers.
--	--	-----------------------------------

**Org - Level Commendations**

Description
CERTIFICATION AND BENEFIT ISSUANCE: • The SFA provides the 30 day carryover of eligibility status to students who received benefits in the previous year and benefits are extended to all household members. • All income applications reviewed were determined correctly and contained the required parent and staff signatures, dates and social security information. • The SFA correctly completed the ethnic racial form which shows no discrimination was made in determining the eligibility status of households. • The SA approved letter of notification of benefits was sent to Direct Certification households. • Direct Certification lists were downloaded on time and on file. • Applications were processed within the required 10 day timeframe. • All households that applied and were denied were notified with the letter of notification of results.
CIVIL RIGHTS: • The SFA provides applications in alternate languages and provides access to interpreters as needed for families with Limited English Proficiency. • Civil Rights training was provided to all food service staff. • The public release was sent to the local media outlet at the beginning of the school year. • The ethnic racial form was completed and no discrimination was made in determining eligibility status of students who applied for benefits. • The “And Justice For All” poster was on display. • The SFA has diet modification statements on file for all students with the special diet needs and the SFA works with families to ensure that all students have their dietary needs met.
COMPETITIVE FOODS/SMART SNACKS: • The SFA provides Smart Snacks through their snack line after lunch service and through 2 vending machines at the middle school. The SFA has nutrition calculator print outs for all items sold and all available items are Smart Snack approved for all grade groups that have access.
Eagle Grove Elementary Fresh Fruit and Vegetable Program (FFVP): The FFVP is available to all enrolled children in the elementary school building. The FFVP is offered during the day, but not during the school breakfast and school lunch meal service time. The school does not spend any FFVP grant funds on administrative costs allowing more funds to be used to purchase fresh fruits and vegetables for the program. Cost documentation for fresh fruits and vegetables was available to validate March 2017 claim for reimbursement. A separate ledger account is assigned for FFVP grant. Cost documentation was well organized. Standard Operating Procedure (SOP) for the FFVP is available.
FOOD SAFETY: • The SFA has a HACCP Plan that is available at all sites. • The SFA has temperature logs for the refrigerator, freezer, dry storage, and dishwasher. • Good food safety practices were observed by staff during the lunch and breakfast service.
MEAL COUNTING AND CLAIMING: • All students who were counted and claimed as having a reimbursable meal at the observed breakfast and lunch had all of the required components. • The edit check matches the claim numbers submitted. • The counts on the day of review were reasonable when compared to the review period count. • The total number of students counted and claimed daily during the review period did not surpass the total number of students enrolled in each of the eligibility categories.
MEAL PATTERN REQUIREMENTS: • The SFA has diet modification statements for all students requiring a special diet and the SFA works with families to ensure students get what they need. • The SFA provides 3 approved milk options. • The cashier is trained on a reimbursable meal. • Signage is posted for both lunch and breakfast. Posters and murals promoting healthy foods are displayed throughout the serving line. • All students observed at breakfast and lunch had a reimbursable meal. • Daily food production records were available for all meals claimed. • The FSD is collecting CN labels for all commercial combination products and all homemade items had standardized recipes. • The elementary and middle school students are provided with various vegetable options throughout the week on the vegetable and fruit bar. • Condiments were proportioned and students are restricted on the number of packets they are allowed to take. • All of the daily and weekly breakfast meal component requirements were met for the review period. • All of the daily and weekly fruit, meat/meat alternate, grain, and milk requirements were met for the review period at the middle school/review site.

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Eagle Grove Comm School District (19440000)**  
**April 25 – 27, 2017**

ONSITE MONITORING: • The onsite monitoring forms for the high school, middle and elementary schools were completed for both breakfast and lunch by February 1.
PROCUREMENT: The SFA has a procurement plan on file that includes a signature page and code of conduct. - Bid documents for their milk and bread bids are on file. The district did a good job completing the procurement plan for SY 2016-2017.
PROFESSIONAL STANDARDS: • The SFA uses the Iowa Professional Standards tracking tool to track the training for school nutrition program staff. • The SFA has training documentation on file to show the training that has taken place for all food service staff and the authorized representative. - One of the food service directors has received all of her required training hours (12) and the other food service director has plans on obtaining the remainder of her hours (6.5 hours) by attending summer short course in June 2017. - Both food service directors are ServSafe certified.
RECORD KEEPING: • School nutrition program documents are kept for at least three years plus the current year.
RESOURCE MANAGEMENT:- The SFA has their own financial account and has less than 3 months of operating costs in their account. - The SFA charges the correct paid student lunch price as required by their PLE tool and the correct adult meal price. - Payments made into the school food service account are directly deposited into the food service account.
SCHOOL WELLNESS POLICY: - The districts school wellness policy contains all of the required elements. - The wellness committee contains a variety of stakeholders and the public is made aware of committee meetings through advertisements in the school paper and through letters sent home with students. - The district has implemented a variety of health events for students, staff and the community including a health and safety day, physical activity events for students and staff and opportunities to help manage students with mental health issues. - The district has a page on their website that offers health information, exercises and recipes for staff and parents.
SUMMER FOOD SERVICE PROGRAM AND SCHOOL BREAKFAST PROGRAM OUTREACH: - The SFA provides information to families about the SFSP and SBP through their website and flyers posted throughout the community.
VERIFICATION: - The verification report and process were completed on time and the correct number of applications were verified (4). - Applications to verify were picked from the error prone applications first. - The SFA used the SA approved template letter to notify families that they were picked for verification and sent the letter of verification results to all families. - Families that did not respond to the initial letter of notification were sent a follow up letter and families whose benefits were reduced were sent a letter of results informing them that their benefits were being reduced and their right to appeal within the required timeframes. - When the families selected for verification turned in their proof of income the SFA correctly verified their income.
WATER: Free, potable water is available at both breakfast and lunch through a water fountain directly outside of the cafeteria.